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Before the
Federal Communications Commission
Washington, DC 20554

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In the Matter of)
)
Amendment of Part 95 of the)
Commission's Rules to)
Establish a Very Short Distance)
Two-Way Voice Radio Service)

WT Docket 95-102

Comments to a Notice of Proposed Rule Making

Filed by:

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GMRS call sign KAF4141
Amateur call sign AB7JG

9-29-95

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Office of the Secretary
Federal Communications Commission
Washington, DC 20554

Dear Sirs:

I oppose the placement of the "Family Radio Service" in the same frequencies that are currently in use for the General Mobile Radio Service. I currently am a licensee in GMRS. I am qualified to comment on the technical aspects of this proposal since I also hold an Amateur Extra license in the amateur service, call sign AB7JG.

My family and I enjoy the use of GMRS primarily using low power, 1-2 watt, hand talkies on the interstitial frequencies for communication when camping, snow skiing, and boating. I do not see a purpose in creating a FRS since any other family can also enjoy these same communication privileges by simply obtaining a license in the already established radio service for families, i.e., GMRS.

There are many flaws with the present proposal for establishing the Family Radio Service. The most sinister aspect is the lack of licensing. Licensing provides accountability and responsibility. The de licensing of Citizens Band enormously illustrates these concerns. The use of profanity on CB has essentially eliminated this as a means of family communication. The FCC has given up on enforcing any of the restrictions on CB and I fear this will also occur in an unlicensed FRS. Transmission of music, profanity, annoying remarks, malicious interference, the use of sound effects and echo chambers are widespread on CB yet all prohibited by law. The illegal use of linear amplifiers is also common on CB. One CB operator in the Phoenix area boasts of using 540 watts yet the service is restricted to 4 watts AM and 12 watts SSB. The restrictions in the proposed Family Radio Service say they will restrict power to 1/2 watt. How will that be enforced, considering 50 watt GMRS radios and commercial UHF linear amplifiers can be easily mail ordered?

How will the FCC restrict the FRS to families? Lack of licensing will allow any business to operate on these frequencies. With only 14 channels, business use could essentially block any family use in metropolitan areas. The FCC already previously determined that operation of commercial communications on GMRS frequencies should be discouraged and thus limited new licensees to only families.

The 1/2 watt restriction will not eliminate interference with existing GMRS licensees considering that antenna height more so than power determines propagation at UHF frequencies. In one instance my wife and I were able to communicate over 35 miles using one watt hand talkies on

GMRS when she was transmitting from a mountain. One half watt hand talkies could propagate similar distances and cause interference over a wide area if transmitting from a mountain or tall building.

The proposed 12.5 kHz spacing between the proposed FRS channels and the current GMRS primary frequencies is not adequate to prevent interference. I presently experience interference when another GMRS operator is transmitting on a channel only 12.5 kHz away. Considerable interference with GMRS repeaters would be expected if use of the 467 MHz interstitial frequencies are permitted according the proposal. Allowing use of continuous tone coded squelch on the proposed FRS 467 MHz channels may increase the interference with existing repeater service in GMRS, since many repeaters currently use CTCSS tones.

The motivation to establish the family radio service is to sell radios. The primary beneficiaries of this proposal are Tandy, Motorola and Maxon who will make FRS radios, not the public. Instead of de licensing why not a proposal to simplify the GMRS licensing procedure, particularly allowing for temporary operation pending licensing. I agree the GMRS spectrum is underutilized and welcome more licensed users. More licensed users would increase the chance of finding assistance in times of emergencies.

In summary, I recommend to continue the present family radio service, GMRS, as it exists, but simplify the process of licensing to encourage more users. If creation of a Family Radio Service is inevitable, then allocate frequencies in the 900 MHz band, where low power, unlicensed use already exists. If invasion of the GMRS spectrum must be permitted, then limit the use to the seven 462 MHz interstitial channels, do not permit CTCSS, and make FRS operation secondary to GMRS.

Sincerely,



David Kipp, M.D.
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